

**EPA-GE Citizen Coordinating Council  
Optional Meeting – January 18, 2006**

**Highlights**

**Allendale School**

MADEP described the results of its soil sampling in the crawl space as follows:

- Soil sampling for the crawl space showed no contamination that would make the crawl space unsafe for maintenance workers accessing the space or to children and teachers in the school above. 94 samples were taken from the crawl space that runs beneath the school from depths of 0 to 6 inches and 6 inches to 1 foot ; 89 samples were below 2 ppm or showed non-detection of PCBs, and five samples showed between 2 ppm and 3.07 ppm PCBs. MADEP's standard for PCBs in residential soil is 2 ppm.

Several questions and concerns were raised regarding the sampling methods and results.

- Regarding the actual data, MADEP was asked how it was possible for 3 ppm in the crawl space to be safe when the cleanup level is 2 ppm. MADEP was also asked about the possibility of custodians tracking dirt into the classrooms after being in the crawl spaces and asked if children are exposed to PCBs under the classroom in the crawl space. The response was that under the MCP, the results are averaged to calculate an exposure concentration. The exposure concentration is then compared to the appropriate standard. In this situation, the only exposure is to maintenance workers. Since the average concentration in all areas of the crawl space is below the residential soil cleanup level of 2 ppm, there is no significant risk to maintenance workers. Furthermore, the children can not come into contact with the soil in the crawl space. However, even if they could, the concentrations in the soil are below residential cleanup standards that are protective of children. Lastly, since the levels of PCBs in the soil in the crawl space are below residential cleanup standards, inadvertent tracking of this material into classrooms, should it occur, would not present a problem.
- Concerns were raised regarding the sampling methodology, including the use of averaging and the use of congener specific analysis versus aroclor specific analysis. Meeting participants stressed that it was important to use the best available science so that there would be absolute certainty that the school is safe and that it was necessary to err on the side of caution. MADEP responded that their regulations specifically state that averaging is appropriate. EPA concurred with MADEP that the data indicates that the crawl space is not a problem. EPA added that it is sharing information and data with others so that they can weigh in on EPA's decisions and that the Agency remains open to new information.
- CCC members emphasized that their position regarding Hill 78 hasn't changed since the beginning and they and members of the public advocated for the relocation of the school regardless of the data. EPA's response was that the data does not show a contamination problem at the school and EPA cannot move the GE site; but EPA does have the responsibility of ensuring that the OPCAs are operated in accord with the Consent Decree so that they don't threaten public health. Making a decision about moving the school is for someone else to decide.
- A request was made for a public health assessment to be conducted at the school. MADPH responded that they would consider the request and also took the opportunity to

remind the group that MADPH has committed to conducting a blood serum study among Allendale School students and teachers.

### **On-Plant Consolidation Areas (OPCAs)**

EPA presented background information on risk calculation regarding air monitoring at the OPCAs and Allendale School for a small number of people who stayed through the end of the meeting. The presentation has been posted on the website.

### **Action Items**

- Respond to the request that a public health assessment be conducted at the school under current conditions (MADPH)
- Address missing reports in the repositories and on the website (EPA)
- Respond to the request to have Dr. Carpenter participate in the CCC (Facilitator)